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Ms. Marianne Milette
U.S. Environmental Protection Agency
1 Congress Street, Suite 1100 (SEP)
Boston, MA 02144-2023

February 17, 2009

Re: Amendment to Draft Phase I PCB Cleanup Completion Report and Draft Interim PCB Containment Measure Work Plan
CAFO #TSCA-01-2006-0060
500 Flatbush Avenue, Hartford, CT

Dear Ms. Milette,

This letter is intended as an amendment to the *Draft Phase I PCB Cleanup Plan and Draft Interim PCB Containment Measure Work Plan* (referenced herein as the *Completion Report* and *Work Plan*, respectively) that was submitted to EPA on January 27, 2009. These amendments are based on a conversation held between myself and Ms. Kimberly Tisa on February 9, 2009. This amendment clarifies the narrative in Section 4.1 of the Completion Report and responds to questions raised by Ms. Tisa. The post encapsulation wipe sampling protocols contained in this amendment are based on procedures developed by Mr. John Woodyard of Weston and recently approved by Region 1 EPA for long term monitoring and maintenance of encapsulated PCB containing materials on the exterior facade of One, Two, and Three Center Plaza located on Cambridge Street in Boston, Massachusetts.

DC requests that EPA expedite the approval of the proposed Interim PCB Containment Measure in order to reduce interruption of the tenant's business operations related to the APS building.

Clarification of Section 4.1 of the PCB Cleanup Completion Report

This paragraph addresses an error in the first paragraph of Section 4.1 of the PCB Cleanup Completion Report which indicated that composite sample PCB concentrations were normalized to the number of grab samples in the composite. Total PCB concentrations detected in cleanup verification samples collected from the concrete matrix of the APS building floor were not normalized to the number of grab samples comprising the composite. However, the action level with which these sample results were compared was normalized to the number of composite samples.

Post Encapsulation Sampling

Post encapsulation sampling will be conducted as described in Section 3.0 of the *Work Plan*. Composite wipe samples consisting of 3 grab samples per composite will be collected from five floor grids on the APS Building floor. One air sample and one duplicate air sample will be collected inside the APS Building. Weston is proposing the following modifications of the sampling protocols to address EPA comments.

Wipe Sampling

Two rounds of wipe sample collection and analysis will be performed at five locations on the floor (grid locations 9, 10, 26, 29 and 32) according to Section 3.2.2 of the Work Plan. The goals are to determine if (a) there is an upward trend in PCB surface concentrations over time, and (b) if the surface levels exceed the established risk-based action level.

In summary the sampling program includes:

- An initial sampling event that will take place shortly after the coating is applied (within a week) to determine if the coating process itself may have mobilized PCBs.
- Subsequent sampling 1 year after completion of encapsulation to indicate if any PCBs concentrations are increasing due to diffusion through the coating.
- Using a reporting limit of 1 µg/100 cm^2 , any results below this level would be reported as non-detect (ND).

Any PCB detections would be associated with the coating application process, not diffusion through the coating.

The following criteria will be used to evaluate wipe sample results:

- If results are < 1 µg/100 cm^2, no action is required;
- If results are 1 to 2.5 µg/100 cm^2, these results will be compared with other sample results to see if the condition is isolated or if there may be a possible cause for the value. No remedial action is required unless or until a trend is established during subsequent sampling rounds;
- If the result is >2.5 µg/100 cm^2, collect additional samples to confirm and define the impacted area. Recoat the delineated area and collect one confirmatory sample.

No sampling is proposed beyond 1 year as the tenant is scheduled to vacate the building by December 2010, after which time the APS building will be vacant.

Air Sampling

Air sampling will be performed in accordance with Section 3.2.1 of the *Work Plan*. At EPA's request, the NIOSH action level of 1 micrograms per cubic meter proposed in the *Work Plan* has been replaced with a risk-based action level calculated by Weston using equations from the EPA *Risk Based Concentration Table users Guide*. This action level is 2.7 micrograms per cubic meter and is based on exposure of adult workers 8 hours per day, five days per week for a period of two years. The excess lifetime cancer risk associated with this action level is 10^{-5}. Actual occupancy of the building is intermittent; therefore this action level is a conservative estimate of risk. The action level calculation is attached to this amendment.

Ms. Marianne Milette
EPA

February 17, 2009

Evidence of Tenant Acceptance of the Proposed Interim Containment Measure

Danny Corp is in the process of obtaining a statement from the tenant indicating that the tenant is amenable to the proposed interim PCB containment, and will inform its employees of the presence of PCBs beneath the containment barrier encapsulating barrier. DC requests that EPA approve this amendment as modified with the understanding that DC will provide EPA with evidence of tenant acceptance of the PCB containment measure prior to beginning work.

Hydraulically Operated Equipment

Danny Corp investigated the type of loading dock leveling equipment currently and historically on the loading docks located on the east side of the building (Wall 4) to determine if they historically contained a hydraulic system that could be a potential source of PCBs. The results of this investigation indicate that mechanical equipment was present from 1960 until 1990. The mechanical equipment was replaced by hydraulically operated equipment in 1990. Given the relatively recent age of the replacement equipment, it would not contain PCB oil.

Please contact me at 860-368-3205 should you have any questions on this amendment.

Sincerely,

Weston Solutions, Inc.

John L. Meyer, LEP
Project Manager

cc: M. Suisman, Danny Corporation
G. Klein, Danny Corporation
A. Kosloff, Esq., Levy & Droney, PC
D. Johnson, Esq., Murtha Cullina, LLP
J. Woodyard P.E., T. Walles, Weston
K. Tisa, EPA
E. Phillips, R&C
J. Blaine, R&C

Attachments:

Air Inhalation Action Level Risk Calculations

Tenant Acceptance Letter –To be provided prior to beginning work

INDOOR AIR PCB INHALATION
RISK BASED PCB ACTION LEVEL CALCULATIONS
PHASE I PCB CLEANUP
500 FLATBUSH AVENE, HARTFORD, CONNECTICUT

Screening Level - worker-air-carcinogen (ug/m3) = [TR x ATc] / [EF x ED x ET (8 hr/24 hr) x IUR]

Exposure Parameters			**Target Risk = 10^{-5}**
PCB Concentration in Air	C_{air}	ug/m^3	2.7E+00
Exposure Time	ET	hr	8
Exposure Frequency	EF	days/yr	250
Exposure Duration	ED	yrs	2
Averaging Time-carcinogens	AT_c	days	25550
Inhalation Unit Risk	IUR	1/(ug/m3)	5.70E-04
Target Risk	TR	unitless	1.00E-05